

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:) Chapter 11
)
W. R. GRACE & CO., *et al.*,¹) Case No. 01-1139 (JKF)
) Jointly Administered
Debtors.)

Related Docket Nos. 13598, 13602, 13772,
13785, 13799, 13873, 13884

**CERTIFICATION OF COUNSEL RE: PROPOSED STIPULATION AND ORDER
RESOLVING THE MOTION OF THE OFFICIAL COMMITTEE OF ASBESTOS
PERSONAL INJURY CLAIMANTS TO COMPEL PRODUCTION OF DOCUMENTS
AND FUTURE CLAIMANTS' REPRESENTATIVE'S MEMORANDUM IN SUPPORT
AND JOINDER IN THE OFFICIAL COMMITTEE OF ASBESTOS PERSONAL
INJURY CLAIMANTS' MOTION TO COMPEL PRODUCTION OF DOCUMENTS**

The undersigned hereby certifies the following:

1. On November 7, 2006, the Official Committee of Asbestos Personal Injury
Claimants ("Asbestos PI Committee"), in the above-captioned cases, filed the *Motion of the*

¹ The Debtors consist of the following 62 entities: W. R. Grace & Co. (f/k/a Grace Specialty Chemicals, Inc.), W. R. Grace & Co.-Conn., A-1 Bit & Tool Co., Inc., Alewife Boston Ltd., Alewife Land Corporation, Amicon, Inc., CB Biomedical, Inc. (f/k/a Circe Biomedical, Inc.), CCHP, Inc., Coalgrace, Inc., Coalgrace II, Inc., Creative Food 'N Fun Company, Darex Puerto Rico, Inc., Del Taco Restaurants, Inc., Dewey and Almy, LLC (f/k/a Dewey and Almy Company), Ecarg, Inc., Five Alewife Boston Ltd., G C Limited Partners I, Inc. (f/k/a Grace Cocoa Limited Partners I, Inc.), G C Management, Inc. (f/k/a Grace Cocoa Management, Inc.), GEC Management Corporation, GN Holdings, Inc., GPC Thomasville Corp., Gloucester New Communities Company, Inc., Grace A-B Inc., Grace A-B II Inc., Grace Chemical Company of Cuba, Grace Culinary Systems, Inc., Grace Drilling Company, Grace Energy Corporation, Grace Environmental, Inc., Grace Europe, Inc., Grace H-G Inc., Grace H-G II Inc., Grace Hotel Services Corporation, Grace International Holdings, Inc. (f/k/a Dearborn International Holdings, Inc.), Grace Offshore Company, Grace PAR Corporation, Grace Petroleum Libya Incorporated, Grace Tarpon Investors, Inc., Grace Ventures Corp., Grace Washington, Inc., W. R. Grace Capital Corporation, W. R. Grace Land Corporation, Gracoal, Inc., Gracoal II, Inc., Guanica-Caribe Land Development Corporation, Hanover Square Corporation, Homco International, Inc., Kootenai Development Company, L B Realty, Inc., Litigation Management, Inc. (f/k/a GHSC Holding, Inc., Grace JVH, Inc., Asbestos Management, Inc.), Monolith Enterprises, Incorporated, Monroe Street, Inc., MRA Holdings Corp. (f/k/a Nestor-BNA Holdings Corporation), MRA Intermedco, Inc. (f/k/a Nestor-BNA, Inc.), MRA Staffing Systems, Inc. (f/k/a British Nursing Association, Inc.), Remedium Group, Inc. (f/k/a Environmental Liability Management, Inc., E&C Liquidating Corp., Emerson & Cuming, Inc.), Southern Oil, Resin & Fiberglass, Inc., Water Street Corporation, Axial Basin Ranch Company, CC Partners (f/k/a Cross Country Staffing), Hayden-Gulch West Coal Company, H-G Coal Company.

Official Committee of Asbestos Personal Injury Claimants to Compel Production of Documents
[Docket No. 13598].

2. On November 7, 2006, the Future Claimants' Representative's ("FCR") filed the *Future Claimants' Representative's Memorandum in Support and Joinder in the Official Committee of Asbestos Personal Injury Claimants' Motion to Compel Production of Documents* [Docket No. 13602].

3. On November 22, 2006, the Debtors filed *W. R. Grace & Co.'s Opposition to Motion of the Official Committee of Asbestos Personal Injury Claimants to Compel Production of Documents* (Docket No. 13772).

4. On November 27, 2006, the Debtors filed *W. R. Grace & Co.'s Opposition to Future Claimants' Representative's Memorandum in Support and Joinder in the Official Committee of Asbestos Personal Injury Claimants' Motion to Compel Production of Documents* (Docket No. 13785).

5. On November 27, 2006, the Debtors filed *W. R. Grace & Co.'s Opposition to Future Claimants' Representative's Memorandum in Support and Joinder in the Official Committee of Asbestos Personal Injury Claimants' Motion to Compel Production of Documents* (Docket No. 13799).

6. On December 1, 2006, the Asbestos PI Committee filed *The Official Committee of Asbestos Personal Injury Claimants' Reply Memorandum in Support of Its Motion to Compel Production of Documents* [Docket No. 13873].

7. On December 1, 2006, the FCR filed the *Future Claimants' Representative's Reply in Support of Its Memorandum in Support and Joinder in the Official Committee of*

Asbestos Personal Injury Claimants' Motion to Compel Production of Documents [Docket No. 13884].

8. Attached hereto as Exhibit A, is the proposed Stipulation and Order (the "Proposed Order") agreed to by the Asbestos PI Committee, the FCR, and the Debtors (collectively, the "Parties") with respect to the items set forth in paragraphs 1 through 7.


9. Accordingly, the Parties request entry of the Proposed Order at the Court's earliest convenience.

Dated: December 15, 2006

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